

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of

Division

BAH-25-CV-1494

Case No. R # 2025001897 Appeal #2023001584

(to be filled in by the Clerk's Office)

Miles Waters a/k/a Ross R., I

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

John Phelan, Secretary, Department of the Navy,
Agency

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Miles L. Waters
Street Address	4217 Colonial Rd.
City and County	Pikesville.
State and Zip Code	MD 21208
Telephone Number	410-303-5377
E-mail Address	lilfellolinks@yahoo.com

HD

Rcv'd by:

AIR

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B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	John Phelan,
Job or Title (<i>if known</i>)	Secretary, Department of the Navy
Street Address	1000 Navy Pentagon
City and County	Washington
State and Zip Code	Washington, DC 20350-1000
Telephone Number	(703) 695-0965
E-mail Address (<i>if known</i>)	unknown

Defendant No. 2

Name	Daniel White
Job or Title (<i>if known</i>)	Agency Representative
Street Address	1314 Harwood St SE Bldg 212,
City and County	DC
State and Zip Code	Washington, DC 20374
Telephone Number	(202) 374-2487
E-mail Address (<i>if known</i>)	Daniel.w.white48.civ@us.navy.mil

Defendant No. 3

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

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E-mail Address (if known) _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

ATTORNEY'S FEES (H1019) If Complainant has been represented by an attorney (as defined by 29 C.F.R. § 1614.501(e)(1)(iii)), she is entitled to an award of reasonable attorney's fees incurred in the processing of the complaint. 29 C.F.R. § 1614.501(e). The award of attorney's fees shall be paid by the Agency. The attorney shall submit a verified statement of fees to the Agency -- not to the Equal Employment Opportunity Commission, Office of Federal Operations -- within thirty (30) calendar days of receipt of this decision. The Agency shall then process the claim for attorney's fees in accordance with 29 C.F.R. § 1614.501. This Court has jurisdiction pursuant to 28 U.S.C. § 1343 and 42 U.S.C. § 2000e-5(f). Once the plaintiffs have complied with the procedural requirements of Title VII (42 U.S.C. § 2000e et seq.) (Trial Transcript (hereinafter Tr.) 161, 162, 688-690; Plaintiff Trial Exhibits (hereinafter P. E.) 17, 27, 28) in which the Plaintiff was never awarded. Wherefore, through the Right to Sue process, the Plaintiff is seeking relief and it's further.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Miles L. Waters, is a citizen of the
State of (name) Maryland.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

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(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of
the State of (name) _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) John Phelan Secretary, DON, is incorporated under
the laws of the State of (name) All 50 States, and has its
principal place of business in the State of (name) Worldwide.
Or is incorporated under the laws of (foreign nation) No,
and has its principal place of business in (name) Department of the Navy.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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On 04/24/2025 Appellate Decision for my Appeal # 2025001897 DEC, allowed complainant 90 days to file a Civil suit for Reimbursement of Legal Fees, and Punitive damages related to a Title VII Violation, "RETALIATION, REPRISAL, ADVERSE ACTIONS and DISPARATE TREATMENT"! My complaint was investigated but not the "RETALIATION, REPRISAL, ADVERSE ACTIONS and DISPARATE TREATMENT" that took the EEOC 6 years, 6 months and 11 days to find the The Department of the Navy guilty of title VII Rights violation.

ATTORNEY'S FEES (H1019) (as defined by 29 C.F.R. § 1614.501(e)(1)(iii)), she is entitled to an award of reasonable attorney's fees incurred in the processing of the complaint. 29 C.F.R. § 1614.501(e). The award of attorney's fees shall be paid by the Agency. The attorney shall submit a verified statement of fees to the Agency -- not to the Equal Employment Opportunity Commission, Office of Federal Operations -- within thirty (30) calendar days of receipt of this decision. The Agency shall then process the claim for attorney's fees in accordance with 29 C.F.R. § 1614.501. This Court has jurisdiction pursuant to 28 U.S.C. § 1343 and 42 U.S.C. § 2000e-5(f). Once the plaintiffs have complied with the procedural requirements of Title VII (42 U.S.C. § 2000e et seq.) (Trial Transcript (hereinafter Tr.) 161, 162, 688-690; Plaintiff Trial Exhibits (hereinafter P. E.) 17, 27, 28) were never awarded.

Therefore, through the Right to Sue process, the Plaintiff is seeking relief and it's further.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Remaining unpaid Legal Fee Balance \$31,200.00, Reimbursement for Initial Legal Fees out of pocket from Loans & retirement funds \$40,000.00, Damages occurred from Denial/Delay of Employee OPM Step increase for 6 years \$145,000.00, Punitive damages for Mental Stress, compensation for pain and suffering \$???,000.000 [\$345,000.00 to \$700,000.00]

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

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Date of signing: 05/07/2025

Signature of Plaintiff



Printed Name of Plaintiff

Miles L. Waters

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

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Miles Waters a/k/a Ross R., I

Plaintiff(s)

Jury Trial: Yes

-v-

John Phelan, Secretary, Department of the Navy,
Agency

Defendant(s)

CERTIFICATE OF SERVICE

The Plaintiff(s) Miles L. Waters, Pro se hereby certifies on _____ day of May 2025, that a copy of the above matter was sent Via Email to Defendant # 1 Legal Representation Daniel White, *NO COPY OF*
~~Daniel.w.white48.civ@us.navy.mil~~ *Ret.*

Respectfully Submitted

Miles L. Waters Pro se